IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

In re:

WOODBRIDGE GROUP OF COMPANIES, LLC et al.,
Debtors.

CHAPTER 11

Case No. 17-12560-KJC

Jointly Administered

CONTRARIAN FUNDS, LLC,

Appellant,

v.

WOODBRIDGE GROUP OF COMPANIES, LLC, et al., Appellees.

Appeal from the Bankruptcy Court

Civil Action No. 18-996-LPS

STIPULATION TO EXTEND BRIEFING SCHEDULE

WHEREAS, on July 3, 2018, Contrarian Funds, LLC ("Contrarian") filed a notice of appeal from the order of the Bankruptcy Court for the District of Delaware sustaining the objection of the Woodbridge Group of Companies, LLC (the "Debtors") to proof of claim no. 1216 filed by Contrarian;

WHEREAS, on August 13, 2018, pursuant to the Court's Standing Order dated September 11, 2018 and Chief Magistrate Judge Mary Pat Thynge's oral order dated July 18, 2018, Contrarian and the Debtors delivered a joint submission to Judge Thynge advising her that the parties were engaged in settlement discussions and requesting that the appellant's opening brief be due on September 10, 2018, the appellee's opposition brief be due October 15, 2018, and appellant's reply brief be due on October 29, 2018;

WHEREAS, on August 13, 2018, Judge Thynge issued a recommendation adopting the proposed briefing schedule; and

WHEREAS, Contrarian and the Debtors have continued to engage in settlement discussions and believe that additional time may result in a consensual resolution of the issues on appeal.

NOW, THEREFORE, Contrarian and the Debtors stipulate and jointly request that the briefing schedule be extended by two weeks as follows:

- Appellant's opening brief shall be due September 24, 2018
- Appellee's brief in opposition shall be due October 29, 2018
- Appellant's reply brief shall be due November 12, 2018
- Dated: August 31, 2018 Wilmington, Delaware

BIELLI & KLAUDER, LLC

/s/ David M. Klauder

David M. Klauder (No. 5769)

1204 N. King Street Wilmington, DE 19801

Phone: 302-803-4600 Fax: 302-397-2557

Email: dklauder@bk-legal.com

KRAMER LEVIN NAFTALIS AND FRANKEL LLP

P. Bradley O'Neill (pro hac vice) Philip M. Guffy (pro hac vice) 1177 Avenue of the Americas New York, New York 10036

Phone: 212-715-9100 Fax: 212-715-8000 boneill@kramerlevin.com pguffy@kramerlevin.com

HALPERIN BATTAGLIA BENZIJA, LLP

Alan D. Halperin Debra J. Cohen 40 Wall Street, 37th Floor New York, New York 10005

Phone: 212-765-9100 Fax: 212-765-0964

ahalperin@halperinlaw.net dcohen@halperinlaw.net

Counsel for Appellants Contrarian Funds, LLC

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Edmon L. Morton

Sean M. Beach (No. 4070)

Edmon L. Morton (No. 3856)

Michael M. Neiburg (No. 5275)

Ian J. Bambrick (No. 5455)

1000 North King Street

Wilmington, Delaware 19801

Phone: 302-571-6600 sbeach@ycst.com

KLEE, TUCHIN, BOGDANOFF & STERN LLP

David M. Stern (pro hac vice) Robert J. Pfister (pro hac vice)

1999 Avenue of the Stars, 39th Floor

Los Angeles, California 90067

Phone: 310-407-4025 Fax: 310-407-9090 dstern@ktbslaw.com rpfister@ktbslaw.com

Counsel for Appellees Debtors

SO ORDERED

Chief U.S. Magistrate Judge Mary Par Thynge